

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANGELA E. WILLIAMS

CIVIL ACTION

v.

NO.

YORK COUNTY AGRICULTURE SOCIETY
and
YORK FAIR AND YORK EXPO CENTER
and
REITHOFFER SHOWS, INC.

NOTICE OF REMOVAL

TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA:

Defendants, by and through their attorneys, MINTZER, SAROWITZ, ZERIS, LEDVA & MEYERS, hereby removes the above-captioned case to this Honorable Court and provides Notice of same to Counsel representing the Plaintiff. In support of the Removal, the Defendants aver as follows:

1. On September 8, 2006, Plaintiff, Angela E. Williams commenced the within Civil Action by filing a Complaint in the Court of Common Pleas of Philadelphia County. A true and correct copy of the Complaint is attached hereto and marked as Exhibit "A".

2. Defendants first received Notice of the action when they received a copy of the Complaint from Plaintiff's Counsel by cover letter dated September 9, 2006 was not received by the Defendant until September 21, 2006. A true and correct copy of Plaintiff's Counsel's September 19, 2006 letter is attached hereto and marked as Exhibit "B".

3. Therefore, the instant Notice of Removal is timely filed within thirty (30) days after receipt of the Complaint in accordance with 28 USC §1446.

4. In the Complaint, Plaintiff avers that she is a resident of Beltsville, MD (See Exhibit "A").

5. Defendants, York County Agriculture Society and York Fair and York Expo Center are Pennsylvania business entities doing business with their principal place of business located in York, PA.

6. In her Complaint, Plaintiff seeks damages in excess of \$50,000.00 (See Exhibit "A").

7. Moreover, Plaintiff claims that as a result of the accident, she suffered severe and permanent injuries (See Exhibit "A").

8. Based on the allegations in Plaintiff's Complaint, the amount in controversy is certainly alleged to be in excess of \$75,000.00 (See Exhibit "A").

9. As such, the above-captioned Civil Action is one of which this Honorable Court has original jurisdiction pursuant to Title 28 United States Code §1332, based upon the fact that there exists diversity of citizenship between the parties and the amount in controversy is alleged to be in excess of \$75,000.00 and it is accordingly one which may be removed to this Honorable Court by Notice pursuant to Title 28 United States Code §1441.

WHEREFORE, Defendants respectfully request that the above action now pending in the Court of Common Pleas for Philadelphia County, Pennsylvania be

removed to this Court.

MINTZER, SAROWITZ, ZERIS, LEDVA & MEYERS

BY: _____
s/LAWRENCE S. SAROWITZ (4381)
Attorney for Defendant,
Reithoffer Shows, Inc.
22nd Floor, 1528 Walnut Street
Philadelphia, PA 19102
(215) 735-7200
MSZL&M File No. 000380.000043

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CERTIFICATE OF SERVICE OF
NOTICE OF FILING OF NOTICE OF REMOVAL**

I hereby certify that on October 20, 2006, I served a true and correct copy of the foregoing Notice of Removal on the following named counsel by first class mail, postage prepaid:

Jack M. Bernard, Esquire
1930 Land Title Building
100 South Broad Street
Philadelphia, PA 19110

MINTZER, SAROWITZ, ZERIS, LEDVA & MEYERS

BY: _____
s/LAWRENCE S. SAROWITZ (4381)
Attorney for Defendant,
Reithoffer Shows, Inc.
22nd Floor, 1528 Walnut Street
Philadelphia, PA 19102
(215) 735-7200
MSZL&M File No. 000380.000043